

June 5, 2006

Ms. Mary L. Cottrell, Secretary
Dept. of Telecommunications & Energy
One South Station
Boston, MA 02110

RE: D.T.E. 06-48

Dear Ms. Cottrell:

Middleborough Gas & Electric Department (MG&ED) submits the following information in response to the Department of Telecommunications & Energy's (DTE) Order opening an investigation into the compliance with G.L. c. 164, § 116B.

Bullet #1

The relevant portion of MG&ED Operations Manual, which ensures compliance with Section 116B, can be found in Sections 1000.010 (2) and 1000.030 (A) of the department's manual. Below is a copy of these two sections of the manual.

OPERATIONS MANUAL
Middleborough Gas & Electric Department
Gas Department

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CATEGORY	VALVES	DATE 01/06 R
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1000.010	<u>TYPE OF INSPECTION - MAINTENANCE CODE</u>
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	2. Visual Inspection -
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	a.) Examine body, bolts, nuts, and hand wheel for damage or corrosion.
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	b.) Accessibility of the valve box so that it will not hinder gas shutoff in an emergency.
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1000.030	<u>CLASSIFICATION OF VALVES</u>
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	A. Operational - (CRITICAL VALVES)
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Valves, which are necessary for the safe operation of the distribution system are considered to be Critical Valves. Critical valves shall be inspected on an annual basis each calendar year not to exceed fifteen months.

Whenever the Department is aware of street restoration projects, critical valves shall be inspected for accessibility. The valve box is to be inspected to confirm that it has not been paved over or damaged in anyway that would hinder the gas valve from being shutoff in an emergency. This inspection shall be done during and after the street restoration project has been completed. The inspection shall be recorded on the Department's Dist. Valve Maintenance Form (Figure 1) and noted in the remarks section of the form.

Bullet #2

Attached you will find an excel spread sheet of the streets that were paved in MG&ED's, Gas Division service territory in 2005. Also listed are the dates the gate boxes were inspected to confirm that they were made "easily and immediately accessible".

Bullet # 3

The relevant portion of MG&ED's operations manual that delineates how MG&ED employees collect data to ensure compliance with Section 116B can be found in Section 1000.030 (A), second paragraph. A copy of this section of MG&ED's Operations Manual can be found in Bullet #1, above.

Bullet #4

Regarding evidence that MG&ED is in compliance with section 116B, I have included a copy of a couple of work orders indicating that the valves were inspected to ensure compliance. (Valves 11B and 118).

Bullet # 5

Middleborough Gas installs distribution line valves in accordance with Part 192, §192.181 and service line valves in accordance with Part 192, §192.365 and 220 C.M.R. § 101.06(14). When a valve is installed underground a valve box is installed over the valve and a print or map of its location is made to document its exact location. This ensures that the valve is readily identifiable by MG&ED personal and allows access for ready operation of the valve.

Whenever the commonwealth or town undertakes the repair of streets, roads or sidewalks, Middleborough Gas inspects and maintains its curb/valve boxes located within the streets, roads or sidewalks to be repaired. Section 1000.030 of the department's

operations manual mentioned above refers to these procedures, as well as the following sections of the department's operations manual.

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CATEGORY	SERVICE LINES	DATE 01/06 R
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300.000 GENERAL

This section is a guide for standard service line installation procedure. Service lines will be installed in accordance with these standards, except as indicated on the design drawings.

Curb valves

All intermediate pressure and high-pressure and service lines and all services two-inches in diameter or larger shall have an under-ground curb valve installed in the proximity of the property line.

Service lines that supply a theatre, church, school factory or other buildings where large number of persons assemble shall have a curb valve installed regardless of the service size or delivery pressure. (CMR 101.06 (14))

Each underground service-line valve must be located in a covered durable curb box that allows ready operation of the valve and is supported independently of the service. (192.365 c)

Valves

Each service line valve must meet the requirements of CFR 192.145.((192.363 a)

A soft seated service line valve may not be used if its ability to control the flow of gas could be adversely affected by the exposure to anticipated heat. (192.363 b)

Each service-line valve on a high-pressure service line, installed above ground or in an area where the blowing gas would be hazardous, must be designed and constructed to minimize the possibility of the removal of the core of the valve with other than specialized tools. (192.363 c & CMR 101.06 (13))

Each service line valve must be installed upstream of the regulator, if there is no regulator, upstream of the meter. (193.365 a)

Each service line must have a shut-off valve in a readily accessible location that, if feasible, is outside of the building. (192.365 b)

If you should have any questions regarding the aforementioned, please do not hesitate to give me a call at (508) 947-1535.

Sincerely,

Bernard W. Gosson
Gas Division Manager

BWG/
Attached

cc: Williams Stevens, Assistant General Counsel, Pipeline Engineering & Safety Division
Christopher Bourne, Director, Pipeline Engineering & Safety Division
James Collins, General Manager, MG&ED